### **REMARKS**

This paper is filed in response to the final Office Action mailed September 1, 2005. Claims 59-103 are currently pending in the application and stand rejected. Claims 102 and 103 are added in this response.

## Rejections Under 35 U.S.C. § 103(a)

Claims 59-70, 75-82, and 84-97 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,226,031, issued to Barraclough et al. (hereinafter "Barraclough et al."). Dependent Claims 71-74, 83, and 98-101 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Barraclough et al. in view of U.S. Patent No. 4,714,959, issued to Pshtissky (hereinafter "Pshtissky"). Applicants submit that the currently pending claims, Claims 59-101, and new Claims 102-103 are allowable over the cited art because both Barraclough and Pshtissky fail to teach or suggest, among other limitations, a system that includes a centralized control site that is operative to enable off-site client workstations to effect communication with selected surveillance cameras, wherein the off-site client workstations cannot initialize communication with the surveillance cameras. In addition, referring to the new claims, both Barraclough et al. and Pshtissky fail to teach or suggest a centralized control site that provides real time control of surveillance cameras to one or more client workstations. Prior to providing a more detailed discussion as to the patentability of the claims of the present invention, a brief discussion of the present invention and the cited art will be presented.

#### A. <u>Summary of the Present Invention</u>

The present invention is generally directed toward a video surveillance and monitoring system including three identifiable communication and processing layers, namely, a number of surveillance cameras, a centralized control site, and at least one off-site client workstation. The system includes a private network operable to enable two-way communication with one or more surveillance cameras located on-site at a plurality of distinct monitored sites. The centralized control site includes at least one server coupled to the private network and also to a public

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPLLC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682.8100 network. The centralized control site is operable to initialize communications between the surveillance cameras and at least one off-site workstation coupled to a public network. In particular, the off-site client workstation cannot initialize communications directly with the surveillance cameras. Further, the control site enables the off-site client workstations to effect communication with selected surveillance cameras, and provides real time control of the camera to the client workstations. Real time control is provided by converting camera control commands received from a client workstation into a format that is recognizable by the appropriate camera, and sending those commands to the camera. The camera, upon receipt of the commands effects the intended camera control (such as pan, tilt, zoom, etc.).

Numerous advantages may be realized in accordance with one or more embodiments of the present invention. In one aspect, the present invention eliminates the need for each off-site client workstation to have autonomous capability for communication with each individual surveillance camera through the centralization of both image transmission and camera control activities through a control site. For example, a client workstation may access live video monitoring data from three distinct geographic sites without having to individually access, or address, each surveillance camera. In another aspect, the off-site client workstations may communicate with the centralized control site via a public network, while the security cameras maintain data communications within a private network. The centralized control site can maintain initialization control of communications between the workstations and the surveillance cameras. This configuration can mitigate unauthorized direct access of the surveillance cameras by the client workstations. Additional advantages may also be realized in accordance with the present invention.

# B. Summary of U.S. Patent No. 6,226,031 (Barraclough)

Barraclough is directed toward a video communication and monitoring system for use in monitoring a location. In particular, Barraclough describes two types of video communication and monitoring systems. First, Barraclough describes a two-layer system architecture. The

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPLLC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682,8100 two-layer system architecture includes video processing units 210a, 210b that operate at a supervisory level and other remotely-coupled video processing units 214a and 214b through 214z that operate at a subscriber level. As described, communication between remote units and the supervisory units is direct. In particular, Barraclough describes that operation of a two-layered system begins "with a call being established between a remote site and a supervisory

site." (Col. 8, lines 20-23.)

Second, Barraclough describes a three-layer system architecture. The three-layer system includes video processing units 214a and 214b through 214z operating at a subscriber lever, video processing units 210a, 210b operating at a supervisory level, and a server 230 intercoupled between the supervisory video processing units and the subscriber video processing units. (Col. 6, lines 49-53.) The three-layer system described in Barraclough purportedly allows a large number of remote-site units to obtain images recorded by one or more supervisory units 210a, 210b. (Col. 6, lines 49-61.) In particular, Barraclough describes that by inputting commands from a remote site, "a memory 246 can be used to playback selected images that have

The three-layer system of Barraclough does not teach or suggest the use of a central control site to initialize communication between a remote site and a supervisory site. Additionally, the three-layer system of Barraclough does not teach or suggest providing the ability for a remote site to effect real time control of cameras through the server.

been automatically recorded or recorded per customized commands." (Col. 7, lines 50-60.)

# The Claims Distinguished

### A. <u>Independent Claims 59, 75 and 86</u>

Claims 59 and 86 include, among other limitations, "a centralized control site, including at least one server, . . . to enable off-site client workstations to effect communication with selected surveillance cameras, wherein the off-site client workstation cannot initialize communication with the surveillance cameras." (Emphasis added.) Similarly, Claim 75 includes, among other limitations, a centralized control site that "requests and initializes

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPLIC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682.8100 communication between the at least one client workstation and the associated video monitoring device, wherein the client workstation cannot directly access the associated video monitoring device without an initialization by the centralized control site." (Emphasis added.)

The Office Action states that the centralized control site (230) of Barraclough includes a "server...to enable off-site client workstations to effect communication with selected surveillance cameras, wherein the client workstation cannot initialize communication with the surveillance cameras." In support of this position, the Office Action sites Col. 6, lines 49-67, and Col. 5, lines 52-67. Referring first to Col. 5, the cited sections describe a two-tiered environment in which the remote sites communicate directly with the subscriber units through a telephone line with connectivity provided by a central office 226. In this description, presumably a remote site dials a telephone number maintained by the central office 226 (e.g., a telephone company) that is used to connect to the video processing units located at the supervisory site. Referring to Col. 8, Barraclough explains that communication between supervisory units and remote units "begins with a call being established between a remote site and supervisory site." (Col. 8, lines 22-23.) Thus, in the two-tier environment, the remote site is capable of, and does, initialize communication with the surveillance cameras.

Col. 6, lines 49-67, describe that a server 230, such as the "Internet," may be included "on either side of the central office 226 or between two such central offices . . . to permit a large number of remote-site video processing units to communicate with one or more supervisory video processing units." (Col. 6, lines 49-67.) While Barraclough describes that the server allows communication between a remote cite and a supervisory site, there is no discussion that the remote sites "cannot directly access the associated video monitoring device without an initialization by the centralized control site," as required by the claims. In particular, Barraclough simply states that the server permits communication, with no further discussion. Embodiments of the present invention maintain security of the video monitoring devices though the use of a private network between the centralized control site and the video monitoring

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPLLC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682.8100 devices and by not allowing client workstations to directly access the client workstations without initialization by the centralized control site. Barraclough provides no discussion regarding a private network or limiting initialization with the video processing units such that the remote sites "cannot directly access" the video units "without an initialization" by the server. In contrast, Barraclough specifically states that a call is established between the remote site and the supervisory site, i.e., a direct connection that is allowed without initialization by the server. Barraclough provides no discussion regarding security or controlling access to video processing units. The present invention, as claimed, provides a security benefit through the use of: (1) a private network between the centralized control site and the surveillance cameras; and (2) only allowing off-site client workstations to communicate with the surveillance cameras after initialization by the centralized control site (i.e., "the off-site client workstations cannot initialize

Because Barraclough does not describe that client workstations cannot directly access the associated video monitoring device without an initialization by the centralized control site, as required by the claims, Barraclough cannot render Claims 59, 75, and 86 obvious. Accordingly, applicants respectfully request withdrawal of the rejections and allowance of Claims 59, 75, and 86.

# B. <u>Dependent Claims 60-74, 76-85, and 87-101</u>

Dependent Claims 60-74, 76-85, and 87-101 each ultimately depend from respective independent claims 59, 75, and 86 and are therefore believed patentable for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over the art cited. Accordingly, applicants respectfully request allowance of Claims 60-74, 76-85, and 87-101.

# C. New Claims 102 and 103

communication with the surveillance cameras.")

New Claims 102 and 103 include limitations similar to those of independent Claim 75 and are believed patentable for at least the same reasons as those discussed above. In addition,

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESS\*\*LLC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682.8100 independent Claim 102 includes, among other limitations, "wherein the centralized control site provides real time control of a least one video monitoring device to a least one client workstation." There is no discussion in Barraclough of a centralized control site that provides real time control of a video monitoring device to at least one client workstation. The only discussion in Barraclough of camera control is with regard to a direct communication between a remote site and the supervisory site (See Col. 8, lines 59-65.) This section of Barraclough is

supervisory site.

Additionally, new Claim 103 further includes that the centralize control site processes the camera control commands into a format recognizable by the video processing unit. There is no discussion in Barraclough of processing camera control commands by the server.

directed toward, and only describes, direct communication between a remote site and a

Accordingly, new Claims 102 and 103 are believed to be patentable over the cited reference and allowance of the claims is requested.

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## **CONCLUSION**

In view of the foregoing amendments and remarks, applicants submit that the aboveidentified patent application is in condition for allowance. If the Examiner has any questions concerning the foregoing, the Examiner is invited to contact applicants' undersigned attorney at the number provided below.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

LTH:tmm